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OCT 11 2005

For The Northern Mariana Islands
By _____
(Deputy Clerk)6 Attorneys for Defendants
7 American Overseas Marine Corporation
and General Dynamics Corporation

8

9 UNITED STATES DISTRICT COURT

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FOR THE

11

NORTHERN MARIANA ISLANDS

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KENNETH COUTURE,

CIVIL ACTION NO. CV05-0024

13

Plaintiff,

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vs.

DEFENDANTS' INITIAL
DISCLOSURES; CERTIFICATE
OF SERVICE

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AMERICAN OVERSEAS MARINE
CORPORATION and GENERAL
DYNAMICS CORPORATION,

17

Defendants.

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Defendants American Overseas Marine Corporation and General Dynamics Corporation, by and through their Attorney of record, David Ledger, submit the following disclosure statement pursuant to Fed. R. Civ. P. 26(a)(1) and LR 16.2CJ(d):

22

I. Persons likely to have Discoverable Information

23

1. Plaintiff and potentially any member of the crew serving with the plaintiff when the initial injury occurred, a list is attached. Defendants are unaware of any eye-witness to the injury. However, the following individuals have knowledge of the incident and injury: Captain David Hagner, Chief Mate Dan Reed, 2nd A/E William Arnost, 1st A/E Charly Smith, Chief Mate Peter Kirk, MSO Karl Englehart, Donald Farmer.

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2. All health care providers who have treated the plaintiff.

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II. Listing, Description and Location of Documents, Data Compilations and Tangible
4 Things

5 1. See attached documents.

6 III. Description and Computation of Damages

7 Not applicable.

8 IV. Insurance Agreements

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10 There is no "insurance policy" in the form you may be used to seeing. The vessel
11 is entered with a UK-based protection and indemnity association. The vessel owner is a Member
12 of the Association. The Association does not provide liability coverage in the traditional sense.
13 Instead, the Association will indemnify the Owner for losses paid in accordance with Association
14 Rules. You may view the Rules, and other information concerning insurance, at
15 <http://www.standard-club.com>. Click "Enter", and then click on the drop-down category
16 "Cover". We will provide you with a "Certificate of Entry" which shows that the Vessel is
17 entered with the Association and that the Shipowner is a Member.
18

19 V. Expert Testimony

20 Defendants anticipate the need for two expert witnesses, but have yet to retain
21 any.

22 DATED: October 11, 2005.

23 CARLSMITH BALL LLP

24 
25 DAVID LEDGER
26 JOHN D. OSBORN
27 Attorneys for Defendants
28 American Overseas Marine Corporation
and General Dynamics Corporation

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 11th day of October 2005, I will cause to be served, via hand delivery, a true and correct copy of **DEFENDANTS' INITIAL DISCLOSURES** upon the following Counsels of record:

William M. Fitzgerald, Esq.
Law Office of William M. Fitzgerald
1st Floor, Macaranas Building
Post Office Box 909
Saipan, MP 96950

and

Bruce Berline, Esq.
Law Office of Bruce Berline
1st Floor, Macaranas Building
Post Office Box 5682 CHRB
Garapan, Saipan MP 96950

DATED: October 11, 2005.



DAVID LEDGER